

In Condition 9, as we discussed, we would like to revise the dust collector standards to a more direct but equivalent permit condition, as suggested by Jennifer He. Please refer to our July NOI to modify DAQE-523-01. The language there was: "Condition 9 of the new AO lists emission limits for our Group I dust collectors (see page 6 of DAQE-523-01). The same limits are also found in our Title V permit. Since general compliance for these emission units is being met by alternate methods to five year stack tests, IPSC suggests alternate permitting limits be used. When the IPSC Title V permit was issued, language of the permit required IPSC to show continuous compliance by performing more frequent monitoring of dust collectors than the stack tests required once every five years. The DAQ determined that monthly monitoring of dust collector operating parameters was an equivalent compliance method to the five year stack testing with respect to meeting state air regulations. However, as a practical matter, monthly monitoring of operating parameters cannot show direct compliance with an emission rate. But monthly monitoring can show compliance with other operating parameters that directly correlates to emission rates, as shown by previous testing and manufacturer information. Therefore, IPSC recommends that the emission rate limits be substituted with operating parameter limits. Specifically, we suggest using the differential pressure drop across the Group I dust collector fabric filters. Based upon manufacturer's specifications and our own engineering review, the minimum dP should be 0.5 inches of water gage."

Thank you for the opportunity to preview your draft language. If these suggestions are acceptable to you, please change and forward another copy and I'll pass around among my group for further review. I certainly appreciate the efforts you have put into drafting this AO. It was quite a process.

I will be forwarding to you any further changes, if any, concerning actuals to future actuals as calculated by Excel. It will take me a couple of more hours for that. In the meantime, if you have any comments or questions, please call. Thanks.